

**IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF PENNSYLVANIA**

SPECTOR GADON ROSEN VINCI P.C.	:	Civil Action No.
1635 Market Street, 7 th Floor	:	
Philadelphia, PA 19103,	:	Jury Trial Demanded

Plaintiff,

v.

LOUIE AQUILINO & ROBIN AQUILINO :
2306 Doral Drive, Blackwood, NJ :
08012 :

Defendants.

COMPLAINT

Plaintiff, Spector Gadon Rosen Vinci, P.C. (“SGRV” or “Plaintiff”), complains against Defendants, Louie Aquilino and Robin Aquilino (“Defendants” or the “Aquilinos”), as follows:

1. This an action to collect unpaid legal fees and costs SGRV incurred in performing legal services on behalf of Defendants.
2. As of the filing of this Complaint, Defendants have an outstanding balance of approximately \$229,000 in attorney fees and costs (“SGRV Fees”) in connection with the preparation, filing, and representation of the Aquilinos in their Chapter 7 bankruptcy filed in the United States Bankruptcy Court, District of New Jersey, No. 21-01406-JNP and various related adversary proceedings.

3. Despite numerous demands for payment of the SGRV Fees and continued promises to pay substantial portions of same as stated herein, Defendants have failed to do so.

PARTIES

4. SGRV is a Pennsylvania professional corporation organized for the practice of law with its principal place of business at 1635 Market Street, 7th Floor, Philadelphia, PA 19103.

5. Upon information and belief, Defendant Louie Aquilino is an adult person currently residing at 2306 Doral Dr., Blackwood, NJ 08012.

6. Upon information and belief, Defendant Robin Aquilino is an adult person currently residing at 2306 Doral Dr., Blackwood, NJ 08012.

JURISDICTION AND VENUE

7. This Court has jurisdiction over this action under 28 U.S.C. § 1332 because it is between citizens of different states and the amount in controversy, exclusive of interest and costs, is in excess of \$75,000.

8. Venue is proper in this district under 28 U.S.C. § 1391(b) because the district is where the transactions and occurrences out of which the causes of action arose took place, including the formation of the agreement between the parties and the performance of the legal services at issue.

STATEMENT OF FACTS

9. In or around March 2020, SGRV was engaged by Defendants to represent them in connection with their personal Chapter 7 Bankruptcy.

10. Throughout their representation of Defendants, SGRV performed services including, but not limited to, the following: preparing the bankruptcy petition and all other required legal documents; reviewing relevant financial documents; making necessary court appearances; and communicating with the Court, Chapter 7 trustee, US Trustee, creditors, and counsel for all parties, and representing them in related adversary proceedings.

11. SGRV billed Defendants on an hourly basis for the legal services it performed.

12. The basis for SGRV's hourly rates was set forth in its invoices, which were sent to Defendants on a monthly basis.¹

13. Throughout Defendants' representation, Defendants never protested to or objected to SGRV's invoices or the accuracy of any of the time entries or work descriptions contained therein. In fact, they constantly praised and showed appreciation to SGRV lead bankruptcy counsel, Leslie Beth Baskin, Esquire, during the entire course of the representation until the time surrounding the probable sale of Defendants' residence, in November 2021.

14. As of August 2021, Defendants had an outstanding balance of \$151,507.19 in attorney fees and litigation costs.

15. To aid in payment of the outstanding balance, the parties entered into a letter agreement on August 23, 2021² (the "Letter Agreement"), in which SGRV agreed to reduce the then-outstanding balance of attorney fees of

¹ True and correct copies of the relevant invoices sent to Defendants are attached hereto as Exhibit "A."

² A true and correct copy of the August 23, 2021 letter agreement is attached hereto as Exhibit "B."

approximately \$151,000.00 to \$113,000.00 and Defendants agreed to pay SGRV the sum of \$100,000 at closing of their residence located at 2 Lamson Lane, Sewell, NJ ("Residence"), which closing was then not scheduled.

16. The Letter Agreement further provided that payment of the additional \$13,000.00 balance, along with other accruing costs and fees would be paid after payment to SGRV of \$100,000.00.

17. Subsequently, SGRV learned that Defendants closed on the sale of their Residence, but to its dismay SGRV had not been paid the \$100,000.00 agreed upon in the Letter Agreement.

18. SGRV has requested from Defendants a copy of the settlement sheet for the closing of their Residence, but Defendants have refused this request.

19. SGRV believes that the Residence sold for approximately \$745,000.00 which left Defendants with hundreds of thousands of dollars in net proceeds.

20. SGRV believes that Defendants used some of the net proceeds to purchase a new residence at 2306 Doral Drive, Blackwood New Jersey 08012, on November 22, 2021 for \$223,000.00 in cash, and also used some of the net proceeds to repay a debt to Robin Aquilino's parents.

21. Not only did SGRV not receive any payment of the legal fees and costs as agreed to by the parties on August 23, 2021, but since the Letter Agreement, Defendants have accrued an additional \$77,835.44 in attorney fees and costs.

22. As such, Defendants are liable to SGRV for their total unpaid balance for legal fees of \$229,342.63, plus costs.³

COUNT I – BREACH OF CONTRACT

23. SGRV incorporates the preceding paragraphs of this Complaint as though fully set forth herein.

24. SGRV and Defendants entered into an agreement for the provision of legal services in connection with Defendants' personal Chapter 7 bankruptcy in exchange for payment.

25. SGRV performed services for Defendants pursuant to the agreement.

26. By August 2021, Defendants had accrued a balance of \$151,507.19 in attorney fees and litigation costs yet could not make payment. Since that date there has been an additional \$77,835.44 in attorneys' fees and costs.

27. As a result of Defendants' breach of the agreement, SGRV has suffered damages.

WHEREFORE, SGRV demands judgment of this Court against Defendants, Louie Aquilino and Robin Aquilino, for \$229,342.63 plus its costs, together with lawful interest, attorney's fees and costs of suit and such further relief as this court deems appropriate.

³ The figure of \$229,342.63 represents the entire uncompensated amount of fees due and owing before the Letter Agreement plus additional legal fees and costs that have accrued since then.

COUNT II – UNJUST ENRICHMENT

28. SGRV incorporates the preceding paragraphs of this Complaint as though fully set forth herein.

29. SGRV conferred a valuable benefit upon Defendants by performing legal services for them.

30. Defendants accepted, used, and enjoyed the benefits of the legal services that SGRV performed on their behalf.

31. It is inequitable for Defendants to retain those benefits without compensating SGRV.

32. SGRV expended time and labor performing legal services for Defendants, which Defendants used, accepted, and enjoyed as a result of SGRV's efforts.

33. As set forth herein, SGRV reasonably expected to be paid for performing legal services for Defendants.

34. Because of the relationship between the parties, SGRV is entitled to receive the reasonable value of the services it performed for Defendants, which is greater than \$229,342.63, plus costs.

WHEREFORE, SGRV respectfully requests the Court to enter a judgment in favor of SGRV and against Defendants in the amount of \$229,342.63, plus costs, including pre- and post-judgment interests and such further relief as is just and equitable.

COUNT III – ACCOUNT STATED

35. SGRV incorporates the preceding paragraphs of this Complaint as though fully set forth herein.

36. SGRV sent Defendants monthly invoices detailing the services provided in the underlying matter and the amounts due as a result.

37. Defendants never protested or objected to the accuracy of the invoices.

38. As a result of the foregoing, an account stated has been established between SGRV and Defendants in the amount of \$229,342.63 plus costs.

WHEREFORE, SGRV respectfully requests the Court to enter a judgment in favor of SGRV and against Defendants in the amount of \$229,342.63, plus costs, including pre- and post-judgment interests and such further relief as is just and equitable.

Respectfully submitted,

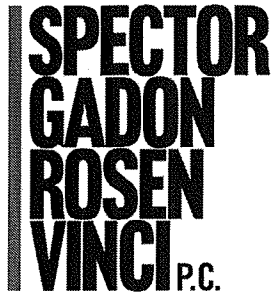
SPECTOR GADON ROSEN VINCI, P.C.

By: */s/ Adam Filbert*

Adam A. Filbert, Esquire
Attorney for Plaintiff

Date: March 9, 2022

EXHIBIT A



Louie Aquilino and Robin Aquilino
2 Lamson Lane
Sewell, NJ 08080

Invoice Date: June 12, 2020
Invoice Number: 160297
Matter Number: 061474-0002

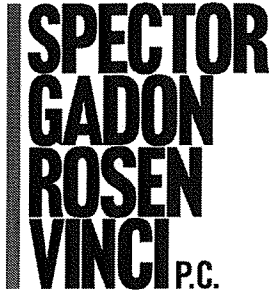
*For Professional Services Through **May 15, 2020***

Client: Louie Aquilino and Robin Aquilino
Matter: Louie and Robin Aquilino Personal Chapter 7

Total Fees	\$	10,825.00
Total Costs	\$	<u>0.00</u>
Total Due This Invoice	\$	10,825.00

Please Remit to:

Mail To:
SPECTOR GADON ROSEN VINCI P.C.
1635 Market Street, 7th Floor
Philadelphia, PA 19103
215-241-8888



Louie Aquilino and Robin Aquilino
2 Lamson Lane
Sewell, NJ 08080

Invoice Date: June 29, 2020
Invoice Number: 160611
Matter Number: 061474-0002

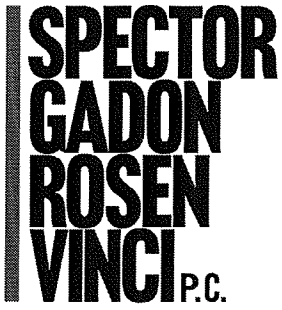
*For Professional Services Through **June 15, 2020***

Client: Louie Aquilino and Robin Aquilino
Matter: Louie and Robin Aquilino Personal Chapter 7

Total Fees	\$	18,830.00
Total Costs	\$	<u>0.00</u>
Total Due This Invoice	\$	18,830.00
 Previous Balance Due	 \$	 <u>10,825.00</u>
Amount Due	\$	<u>29,655.00</u>

Please Remit to:

Mail To:
SPECTOR GADON ROSEN VINCI P.C.
1635 Market Street, 7th Floor
Philadelphia, PA 19103
215-241-8888



Louie Aquilino and Robin Aquilino	Invoice Date:	July 29, 2020
2 Lamson Lane	Invoice Number:	161136
Sewell, NJ 08080	Matter Number:	061474-0002

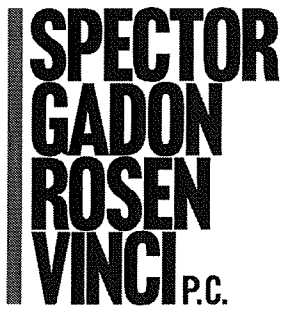
*For Professional Services Through **July 15, 2020***

Client: Louie Aquilino and Robin Aquilino
Matter: Louie and Robin Aquilino Personal Chapter 7

Total Fees	\$	39,532.50
Total Costs	\$	<u>279.70</u>
Total Due This Invoice	\$	39,812.20
 Previous Balance Due	 \$	 <u>29,655.00</u>
Amount Due	\$	<u>69,467.20</u>

Please Remit to:

Mail To:
SPECTOR GADON ROSEN VINCI P.C.
1635 Market Street, 7th Floor
Philadelphia, PA 19103
215-241-8888



Louie Aquilino and Robin Aquilino
2 Lamson Lane
Sewell, NJ 08080

Invoice Date: August 28, 2020
Invoice Number: 161467
Matter Number: 061474-0002

*For Professional Services Through **August 15, 2020***

Client: Louie Aquilino and Robin Aquilino
Matter: Louie and Robin Aquilino Personal Chapter 7

Total Fees	\$	10,990.00
Total Costs	\$	<u>247.44</u>
Total Due This Invoice	\$	11,237.44
 Previous Balance Due	 \$	 <u>64,467.20</u>
Amount Due	\$	<u>75,704.64</u>

Please Remit to:

Mail To:
SPECTOR GADON ROSEN VINCI P.C.
1635 Market Street, 7th Floor
Philadelphia, PA 19103
215-241-8888



Louie Aquilino and Robin Aquilino
2 Lamson Lane
Sewell, NJ 08080

Invoice Date: September 30, 2020
Invoice Number: 161979
Matter Number: 061474-0002

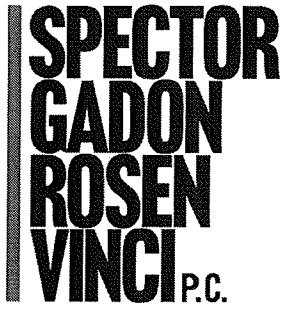
*For Professional Services Through **September 15, 2020***

Client: Louie Aquilino and Robin Aquilino
Matter: Louie and Robin Aquilino Personal Chapter 7

Total Fees	\$	3,080.00
Total Costs	\$	<u>17.57</u>
Total Due This Invoice	\$	3,097.57
 Previous Balance Due	 \$	 <u>75,704.64</u>
Amount Due	\$	<u>78,802.21</u>

Please Remit to:

Mail To:
SPECTOR GADON ROSEN VINCI P.C.
1635 Market Street, 7th Floor
Philadelphia, PA 19103
215-241-8888



Louie Aquilino and Robin Aquilino	Invoice Date:	October 30, 2020
2 Lamson Lane	Invoice Number:	162700
Sewell, NJ 08080	Matter Number:	061474-0002

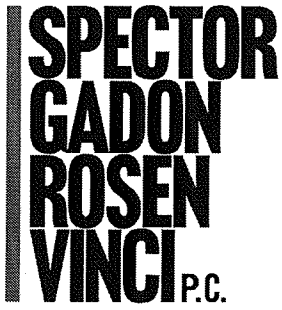
*For Professional Services Through **October 15, 2020***

Client: Louie Aquilino and Robin Aquilino
Matter: Louie and Robin Aquilino Personal Chapter 7

Total Fees	\$	1,977.50
Total Costs	\$	<u>307.40</u>
Total Due This Invoice	\$	2,284.90
 Previous Balance Due	 \$	 <u>78,802.21</u>
Amount Due	\$	<u>81,087.11</u>

Please Remit to:

Mail To:
SPECTOR GADON ROSEN VINCI P.C.
1635 Market Street, 7th Floor
Philadelphia, PA 19103
215-241-8888



Louie Aquilino and Robin Aquilino	Invoice Date:	November 25, 2020
2 Lamson Lane	Invoice Number:	163217
Sewell, NJ 08080	Matter Number:	061474-0002

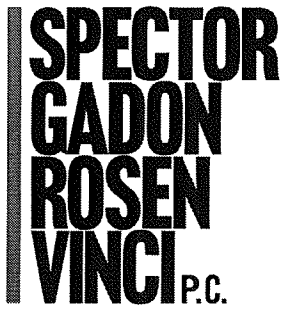
*For Professional Services Through **November 15, 2020***

Client: Louie Aquilino and Robin Aquilino
Matter: Louie and Robin Aquilino Personal Chapter 7

Total Fees	\$	1,715.00
Total Costs	\$	<u>0.00</u>
Total Due This Invoice	\$	1,715.00
 Previous Balance Due	 \$	 <u>81,087.11</u>
Amount Due	\$	<u>82,802.11</u>

Please Remit to:

Mail To:
SPECTOR GADON ROSEN VINCI P.C.
1635 Market Street, 7th Floor
Philadelphia, PA 19103
215-241-8888



Louie Aquilino and Robin Aquilino	Invoice Date:	December 28, 2020
2 Lamson Lane	Invoice Number:	163758
Sewell, NJ 08080	Matter Number:	061474-0002

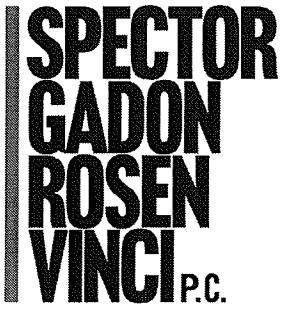
*For Professional Services Through **December 15, 2020***

Client: Louie Aquilino and Robin Aquilino
Matter: Louie and Robin Aquilino Personal Chapter 7

Total Fees	\$	3,482.50
Total Costs	\$	<u>0.00</u>
Total Due This Invoice	\$	3,482.50
 Previous Balance Due	 \$	 <u>82,802.11</u>
Amount Due	\$	<u>86,284.61</u>

Please Remit to:

Mail To:
SPECTOR GADON ROSEN VINCI P.C.
1635 Market Street, 7th Floor
Philadelphia, PA 19103
215-241-8888



Louie Aquilino and Robin Aquilino	Invoice Date:	January 27, 2021
2 Lamson Lane	Invoice Number:	164290
Sewell, NJ 08080	Matter Number:	061474-0002

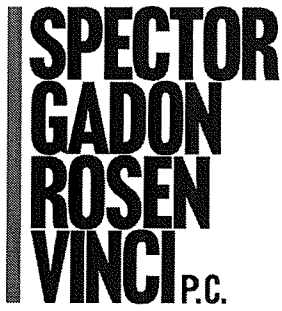
*For Professional Services Through **January 15, 2021***

Client: Louie Aquilino and Robin Aquilino
Matter: Louie and Robin Aquilino Personal Chapter 7

Total Fees	\$	5,775.00
Total Costs	\$	<u>0.00</u>
Total Due This Invoice	\$	5,775.00
 Previous Balance Due	 \$	 <u>86,284.61</u>
Amount Due	\$	<u>92,059.61</u>

Please Remit to:

Mail To:
SPECTOR GADON ROSEN VINCI P.C.
1635 Market Street, 7th Floor
Philadelphia, PA 19103
215-241-8888



Louie Aquilino and Robin Aquilino	Invoice Date:	March 29, 2021
2 Lamson Lane	Invoice Number:	165383
Sewell, NJ 08080	Matter Number:	061474-0002

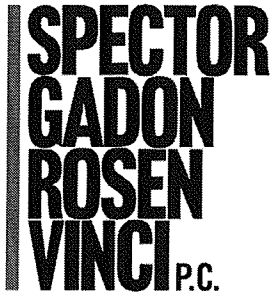
*For Professional Services Through **March 15, 2021***

Client: Louie Aquilino and Robin Aquilino
Matter: Louie and Robin Aquilino Personal Chapter 7

Total Fees	\$ 31,221.50
Total Costs	\$ <u>4.30</u>
Total Due This Invoice	\$ 31,225.80
 Previous Balance Due	 \$ <u>87,059.61</u>
Amount Due	\$ <u>118,285.41</u>

Please Remit to:

Mail To:
 SPECTOR GADON ROSEN VINCI P.C.
 1635 Market Street, 7th Floor
 Philadelphia, PA 19103
 215-241-8888



Louie Aquilino and Robin Aquilino
2 Lamson Lane
Sewell, NJ 08080

Invoice Date: April 30, 2021
Invoice Number: 166164
Matter Number: 061474-0002

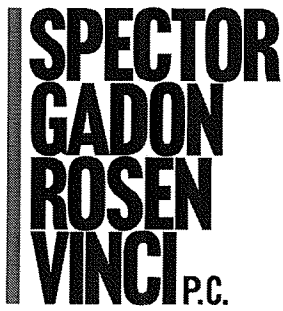
For Professional Services Through April 15, 2021

Client: Louie Aquilino and Robin Aquilino
Matter: Louie and Robin Aquilino Personal Chapter 7

Total Fees	\$	6,440.00
Total Costs	\$	<u>115.28</u>
Total Due This Invoice	\$	6,555.28
 Previous Balance Due	 \$	 <u>118,285.41</u>
Amount Due	\$	<u>124,840.69</u>

Please Remit to:

Mail To:
SPECTOR GADON ROSEN VINCI P.C.
1635 Market Street, 7th Floor
Philadelphia, PA 19103
215-241-8888



Louie Aquilino and Robin Aquilino	Invoice Date:	May 28, 2021
2 Lamson Lane	Invoice Number:	166626
Sewell, NJ 08080	Matter Number:	061474-0002

*For Professional Services Through **May 15, 2021***

Client: Louie Aquilino and Robin Aquilino
Matter: Louie and Robin Aquilino Personal Chapter 7

Total Fees	\$ 3,395.00
Total Costs	\$ <u>224.00</u>
Total Due This Invoice	\$ 3,619.00
 Previous Balance Due	 \$ <u>124,840.69</u>
Amount Due	\$ <u>128,459.69</u>

Please Remit to:

Mail To:
 SPECTOR GADON ROSEN VINCI P.C.
 1635 Market Street, 7th Floor
 Philadelphia, PA 19103
 215-241-8888



Louie Aquilino and Robin Aquilino
2 Lamson Lane
Sewell, NJ 08080

Invoice Date: June 30, 2021
Invoice Number: 167131
Matter Number: 061474-0002

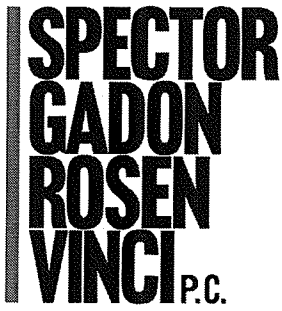
*For Professional Services Through **June 15, 2021***

Client: Louie Aquilino and Robin Aquilino
Matter: Louie and Robin Aquilino Personal Chapter 7

Total Fees	\$	11,970.00
Total Costs	\$	<u>0.00</u>
Total Due This Invoice	\$	11,970.00
 Previous Balance Due	 \$	 <u>128,459.69</u>
Amount Due	\$	<u>140,429.69</u>

Please Remit to:

Mail To:
SPECTOR GADON ROSEN VINCI P.C.
1635 Market Street, 7th Floor
Philadelphia, PA 19103
215-241-8888



Louie Aquilino and Robin Aquilino	Invoice Date:	July 29, 2021
2 Lamson Lane	Invoice Number:	167721
Sewell, NJ 08080	Matter Number:	061474-0002

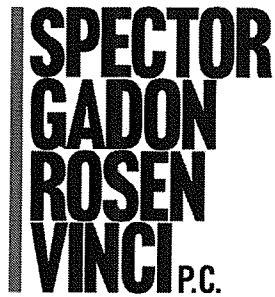
*For Professional Services Through **July 15, 2021***

Client: Louie Aquilino and Robin Aquilino
Matter: Louie and Robin Aquilino Personal Chapter 7

Total Fees	\$ 11,077.50
Total Costs	\$ <u>0.00</u>
Total Due This Invoice	\$ 11,077.50
 Previous Balance Due	 \$ <u>140,429.69</u>
Amount Due	\$ <u>151,507.19</u>

Please Remit to:

Mail To:
 SPECTOR GADON ROSEN VINCI P.C.
 1635 Market Street, 7th Floor
 Philadelphia, PA 19103
 215-241-8888



Louie Aquilino and Robin Aquilino
2 Lamson Lane
Sewell, NJ 08080

Invoice Date: September 30, 2021
Invoice Number: 168765
Matter Number: 061474-0002

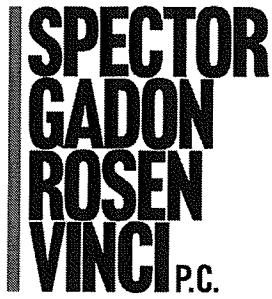
*For Professional Services Through **September 15, 2021***

Client: Louie Aquilino and Robin Aquilino
Matter: Louie and Robin Aquilino Personal Chapter 7

Total Fees	\$ 23,247.50
Total Costs	\$ <u>250.02</u>
Total Due This Invoice	\$ 23,497.52
 Previous Balance Due	 \$ <u>151,507.19</u>
Amount Due	\$ <u>175,004.71</u>

Please Remit to:

Mail To:
SPECTOR GADON ROSEN VINCI P.C.
1635 Market Street, 7th Floor
Philadelphia, PA 19103
215-241-8888



Louie Aquilino and Robin Aquilino
2 Lamson Lane
Sewell, NJ 08080

Invoice Date: October 29, 2021
Invoice Number: 169645
Matter Number: 061474-0002

*For Professional Services Through **October 15, 2021***

Client: Louie Aquilino and Robin Aquilino
Matter: Louie and Robin Aquilino Personal Chapter 7

Total Fees	\$ 17,482.50
Total Costs	\$ <u>3.80</u>
Total Due This Invoice	\$ 17,486.30
 Previous Balance Due	 \$ <u>175,004.71</u>
Amount Due	\$ <u>192,491.01</u>

Please Remit to:

Mail To:
SPECTOR GADON ROSEN VINCI P.C.
1635 Market Street, 7th Floor
Philadelphia, PA 19103
215-241-8888



Louie Aquilino and Robin Aquilino
2 Lamson Lane
Sewell, NJ 08080

Invoice Date: November 29, 2021
Invoice Number: 170114
Matter Number: 061474-0002

*For Professional Services Through **November 15, 2021***

Client: Louie Aquilino and Robin Aquilino
Matter: Louie and Robin Aquilino Personal Chapter 7

Total Fees	\$	13,515.00
Total Costs	\$	<u>50.00</u>
Total Due This Invoice	\$	13,565.00
 Previous Balance Due	 \$	 <u>192,491.01</u>
Amount Due	\$	<u>206,056.01</u>

Please Remit to:

Mail To:
SPECTOR GADON ROSEN VINCI P.C.
1635 Market Street, 7th Floor
Philadelphia, PA 19103
215-241-8888



Louie Aquilino and Robin Aquilino 2 Lamson Lane Sewell, NJ 08080	Invoice Date: December 30, 2021 Invoice Number: 170667 Matter Number: 061474-0002
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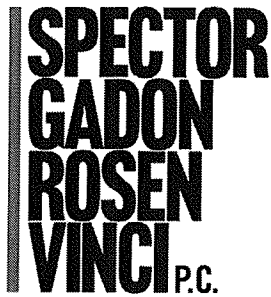
*For Professional Services Through **December 15, 2021***

Client: Louie Aquilino and Robin Aquilino
Matter: Louie and Robin Aquilino Personal Chapter 7

Total Fees	\$ 11,785.00
Total Costs	\$ <u>21.98</u>
Total Due This Invoice	\$ 11,806.98
 Previous Balance Due	 \$ <u>206,056.01</u>
Amount Due	\$ <u>217,862.99</u>

Please Remit to:

Mail To:
 SPECTOR GADON ROSEN VINCI P.C.
 1635 Market Street, 7th Floor
 Philadelphia, PA 19103
 215-241-8888



Louie Aquilino and Robin Aquilino
2 Lamson Lane
Sewell, NJ 08080

Invoice Date: January 27, 2022
Invoice Number: 171333
Matter Number: 061474-0002

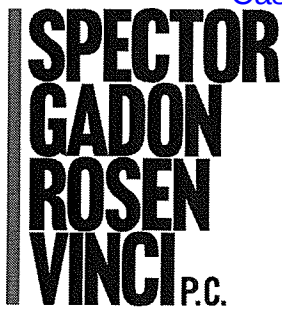
*For Professional Services Through **January 15, 2022***

Client: Louie Aquilino and Robin Aquilino
Matter: Louie and Robin Aquilino Personal Chapter 7

Total Fees	\$ 6,732.50
Total Costs	\$ <u>32.14</u>
Total Due This Invoice	\$ 6,764.64
 Previous Balance Due	 \$ <u>217,862.99</u>
Amount Due	\$ <u>224,627.63</u>

Please Remit to:

Mail To:
SPECTOR GADON ROSEN VINCI P.C.
1635 Market Street, 7th Floor
Philadelphia, PA 19103
215-241-8888



, Louie Aquilino and Robin Aquilino
 2 Lamson Lane
 Sewell, NJ 08080

Invoice Date: February 25, 2022
 Invoice Number: 171796
 Matter Number: 061474-0002

*For Professional Services Through **February 15, 2022***

Client: Louie Aquilino and Robin Aquilino
Matter: Louie and Robin Aquilino Personal Chapter 7

Total Fees	\$	4,715.00
Total Costs	\$	<u>0.00</u>
Total Due This Invoice	\$	4,715.00
 Previous Balance Due	 \$	 <u>224,627.63</u>
Amount Due	\$	<u>229,342.63</u>

Please Remit to:

Mail To:
 SPECTOR GADON ROSEN VINCI P.C.
 1635 Market Street, 7th Floor
 Philadelphia, PA 19103
 215-241-8888

EXHIBIT B



August 23, 2021

sgvrlaw.com

Leslie Beth Baskin
Direct Dial Number
P 215.241.8926
Direct Fax Number
F 215.531.9145
lbaskin@sgvrlaw.com

Seven Penn Center
1635 Market Street
7th floor
Philadelphia, PA 19103
P 215.241.8888
F 215.241.8844

Admitted to practice:
Pennsylvania, New York

Via email (louie.starsandstripes@gmail.com) and First-Class Mail

Louie and Robin Aquilino
2 Lamson Lane
Sewell, NJ 08080

RE: Louie and Robin Aquilino
Our File # 061474-0002

Dear Louie and Robin,

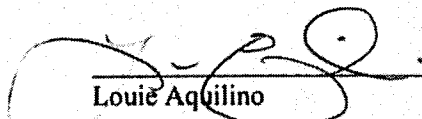
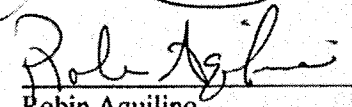
This letter will serve as a follow-up to my firm's recent telephone calls with you regarding payment of your outstanding legal fees and costs in your personal Chapter 7 bankruptcy. As of the beginning of August 2021, the legal fees which are outstanding are approximately \$151,000 ("Fees") and Costs are approximately \$1200.00 ("Costs"). George Vinci has advised that you have agreed to pay the Fees and Costs as follows: The Fees shall be reduced by 25% to the amount of \$113,000 ("Reduced Fees"). The sum of \$100,000 shall be paid at the closing for your residence located at 2 Lamson Lane, Sewell NJ. The payment of the additional \$13,000 from the Reduced Fees, the Costs and any additional fees and costs will continue to accrue and a new fee arrangement for these sums will be made once we are paid at closing. If this comports with your understanding of our arrangement, kindly sign where indicated below. Thank you.

Very truly yours,

/s/ Leslie Beth Baskin

LESLIE BETH BASKIN

SO AGREED:


Louie Aquilino

Robin Aquilino

LBB/tb

cc: George Vinci, Esquire

PHILADELPHIA

NEW JERSEY

FLORIDA

NEW YORK